

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In Re:

JASON L. WOehler

Debtors

Case No: 18-12299-CMA

RUSSELL BRANDT

Plaintiff

Adv. Proc No: 18-01169-CMA

vs.

JASON L. WOehler

Defendant

ANSWER

COMES NOW defendant Jason L. Woehler (“Woehler”), by and through counsel, and
for answer to plaintiff’s complaint, alleges and states:

1. Woehler is without information or belief to admit or deny the allegations in
paragraph 1.1 of the complaint and therefore denies the same.
2. Woehler admits paragraphs 1.2 and 1.3 of the complaint.

1 3. Woehler denies paragraphs 1.4 through 1.12 of the complaint to the extent that
2 such paragraphs contain allegations that require admission or denial.

3 4. Woehler admits paragraphs 2.1 through 2.3 of the complaint.

4 5. Answering the assertions and allegations set forth in section III of the complaint,
5 Woehler's response is as follows:
6

7 3.1: denied
8 3.2 through 3.40: neither admitted nor denied. Many of the factual
9 assertions contained therein may be considered established or not subject to denial due to issue
10 preclusion principles

11 3.41 through 3.43: neither admitted nor denied
12 3.44 through 3.46: denied
13 3.47 through 3.48: admitted
14 3.49 through 3.50: neither admitted nor denied
15 3.51 through 3.54: denied
16 3.55 through 3.56: admitted
17 3.57 through 3.64: denied. The document identified therein speaks for itself.
18 3.65 through 3.66: admitted
19 3.67: denied
20 3.68: denied in part
21 3.69: neither admitted nor denied
22 3.70: admitted
23 3.71: denied. The document identified therein speaks for itself.
24 3.72: denied
25 3.73: neither admitted nor denied. The document identified therein speaks for

itself
3.74: admitted
3.75 through 3.77: neither admitted nor denied. The record identified therein
speaks for itself

3.78: admitted
3.79: admitted
3.80: neither admitted nor denied
3.81 through 3.82: admitted
3.83: neither admitted nor denied. The document identified therein speaks for

itself
3.84: denied
3.85: neither admitted nor denied. The document identified therein speaks for
itself
3.86: Woehler admits receiving attorneys fees from the Lemieux v. King
action

1 3.87: denied
2 3.88: neither admitted nor denied. The document identified therein speaks for
itself and its appearance on a court docket is a public record
3 3.89 through 3.90: neither admitted nor denied. The document identified
therein speaks for itself
4 3.91: debtor admits he amended his schedules
5 3.92: denied. Woehler's counsel requested the continuance because Woehler's
counsel was out of town on the date originally scheduled for the meeting of creditors
6 3.93: admitted
7 3.94: debtor is without information or belief to admit or deny the allegations in
this paragraph and therefore denies the same
8 3.95: admitted
9 3.96: neither admitted nor denied. The document identified therein speaks for
itself
10 3.97: neither admitted nor denied. The document identified therein speaks for
itself
11 3.98 through 3.99: admitted
12 3.100 through 3.107: neither admitted nor denied. The testimony of the debtor
at the meeting of creditors was recorded and is a public record that speaks for itself.
13 3.108: denied
14 3.109: admitted
15 3.110 through 3.112: neither admitted nor denied
16 3.113: denied

17 6. Answering paragraph 4.1 of the complaint, Woehler incorporates by reference
18 his admissions, denials and responses to the allegations in sections I through III of the
19 complaint.

20 7. Woehler denies paragraphs 4.2 through 4.8 of the complaint.

21 8. Answering paragraph 5.1 of the complaint, Woehler incorporates by reference
22 his admissions, denials and responses to the allegations in sections I through IV of the
23 complaint.

24 9. Answering paragraph 5.2 through 5.6 of the complaint, such paragraphs do not
25 contain allegations that can be admitted or denied.

 10. Woehler denies paragraphs 5.7 through 5.35 of the complaint.

1 11. Answering paragraph 6.1 of the complaint, Woehler incorporates by reference
2 his admissions, denials and responses to the allegations in sections I through V of the
3 complaint.

4 12. Woehler denies paragraphs 6.2 through 6.4 of the complaint.

5 13. Plaintiff is not entitled to an award of attorneys fees as requested in paragraphs
6 C and D of his prayer for relief.

7 14. Plaintiff is not entitled to a jury trial as demanded in section VII of the
8 complaint.

9 Having fully answered the complaint, Woehler prays for the following relief:

10 1. Dismissal of the complaint with prejudice;

11 2. Grant such other and further relief as the court deems just and equitable,
12 including awarding Woehler attorney fees and costs that may be taxable on any applicable
13 grounds to the prevailing party in an action to determine dischargeability and an action to deny
14 discharge.

15 DATED this 13th day of January, 2019

16 James E. Dickmeyer, PC

17 By /s/ James E. Dickmeyer

18 James E. Dickmeyer WSBA #14318

19 Attorney for Defendant
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